

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-534-MN-CJB
)	
LANCIUM LLC, MICHAEL T.)	REDACTED VERSION
MCNAMARA, and RAYMOND E. CLINE,)	
JR.)	
)	
Defendants.)	

**DECLARATION OF ADAM M. KAUFMANN IN SUPPORT OF
DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR MOTION FOR SUMMARY
JUDGMENT**

I, Adam M. Kaufmann, under the penalties for perjury states:

1. I have personal knowledge of the facts set forth in this Declaration; I am competent to testify as to all matters stated in this Declaration; and, I am not under any legal disability that would preclude me from testifying. If called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am a partner at the law firm Barnes & Thornburg LLP, counsel of record for Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively, "Defendants") in the above-captioned case. I am licensed in the State of Illinois and admitted *pro hac vice* to practice before this Court. I submit this declaration in support of Defendants' Motion for Summary Judgment.

3. Attached to this Declaration as Exhibit 30 is a true and correct copy of excerpts from June 3, 2022 deposition transcript of Dr. McClellan.

4. Attached to this Declaration as Exhibit 31 is a true and correct copy of excerpts from February 23, 2022 deposition transcript of Austin Storms.

5. Attached to this Declaration as Exhibit 32 is a true and correct copy of excerpts from February 18, 2022 deposition transcript of Michael McNamara.

6. Attached to this Declaration as Exhibit 33 is a true and correct copy of excerpts from June 8, 2022 deposition transcript of Frank McCamant.

7. Attached to this Declaration as Exhibit 34 is a true and correct copy of excerpts from Defendants' Second Set of Supplemental Response to Plaintiffs' Interrogatory No. 3, dated December 23, 2021.

8. Attached to this Declaration as Exhibit 35 is a true and correct copy of the document marked with bates numbers BB1000005-14 as produced by Plaintiffs in this case.

9. Attached to this Declaration as Exhibit 36 is a true and correct copy of the document marked with bates numbers BB00000908-910 as produced by Plaintiffs in this case.

10. Attached to this Declaration as Exhibit 37 is a true and correct copy of the document marked with bates numbers BB0000911-923 as produced by Plaintiffs in this case.

11. Attached to this Declaration as Exhibit 38 is a true and correct copy of the document marked with bates numbers BB1000020-23 as produced by Plaintiffs in this case.

12. Attached to this Declaration as Exhibit 39 is a true and correct copy of the document marked with bates number GAM0000149.

13. Attached to this Declaration as Exhibit 40 is a true and correct copy of the document marked with bates numbers BB0000717-731 as produced by Plaintiffs in this case.

14. Attached to this Declaration as Exhibit 41 is a true and correct copy of excerpts from Expert Report of Dr. Mark Ehsani.

15. Attached to this Declaration as Exhibit 42 is a true and correct copy of the document marked with bates numbers BB00000091-92 as produced by Plaintiffs in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 29, 2022

A handwritten signature in blue ink, appearing to read 'Adam Kaufmann', is written above a horizontal line.

Adam Kaufmann